

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

ZACHARY FIELDS,

Plaintiffs,

v.

KURT R. HALVORSON; DOUBLE D, a  
commercial fishing vessel (with official  
no./primary vessel no. 1177329 and hull  
identification no. MTE1230500805) based at  
hailing port in Marysville, Washington State,

Defendants.

No. 2:21-cv-01591-RSM

STIPULATION AND ORDER TO  
VACATE THE DEADLINES SET BY  
THE ORDER SETTING TRIAL DATE  
AND RELATED DATES

NOTED FOR CONSIDERATION:  
JUNE 6, 2022

Plaintiff Fields and Defendant Halvorson, by and through their respective counsel of record, hereby stipulate and respectfully request the Court vacate the deadlines set by the Order Setting Trial Date and Related Dates. Counsel for the parties conferred about this matter this afternoon. Defendant withdraws his objection to vacating the deadlines in the Order Setting Trial Dates and Related Dates. The parties will continue to conduct discovery and this stipulation does not limit the parties ability to conduct discovery in accordance with the federal rules.

Good cause exists to vacate the future deadlines set by the Court's prior order because the Court has not yet ruled on Plaintiff's pending Motion to Remand. Plaintiff Fields initially filed this maritime action in Snohomish County Superior Court on October 28, 2021, under cause

STIPULATION AND ORDER TO VACATE THE  
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number 21-2-05094-31. On November 24, 2021, Defendant Halvorson filed his Notice of Removal to the United States District Court for the Western District of Washington, under cause number 2:21-cv-01591-RSM. *See Dkt. # 1.*

On December 22, 2021, Plaintiff filed a Motion to Remand and proposed order, noting the motion for consideration on January 28, 2022. *See Dkt. # 8, 8-1.* On January 24, 2022, Defendant filed a Response to Plaintiff's Motion to Remand, along with a proposed order. *See Dkt. # 13, 13-1.* On January 25, 2022, Plaintiff filed a Reply In Support of Motion to Remand. *See Dkt. # 14.* All papers were submitted timely to the Court for the January 28, 2022, hearing date. The parties are currently awaiting the ruling of the motion to remand.

On April 28, 2022, the Court issued its Order Setting Trial Date and Related Dates, noting that Trial starts December 12, 2022. *See Dkt. # 16.* The Motion for Remand remains pending.

In light of the above, the parties hereby stipulate and respectfully request the Court vacate the deadlines set by the Order Setting Trial Date and Related Dates.

DATED this 3<sup>rd</sup> day of June, 2022.

/s/ James Gooding

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*Attorneys for Defendant*

**ORDER**

Pursuant to the parties' stipulation, the Court makes the following order:

The deadlines set by the Order Setting Trial Date and Related Dates  
are vacated.

IT IS SO ORDERED.

DATED this 22<sup>nd</sup> day of July, 2022.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF ELECTRONIC FILING**

I HEREBY CERTIFY that on the 6th of June 2022, I electronically filed the above  
with the Clerk of the Court using the CM/ECF system, which will send notification of such  
filing to:

Eric S. Chavez  
Kimberly A. West  
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DATED this 6<sup>th</sup> day of June, 2022.

By: s/ Shannon Henry  
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STIPULATION AND ORDER TO VACATE THE  
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